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(Conspiracy to Commit Wire Fraud)

1. From in or about March 2017 up to and including in or about September 2018, in the Southern District of New York and elsewhere, ISIS MARIE CAPRE FRANCESHI, a/k/a "Marie Capre," a/k/a "Camilla Febus," a/k/a "Isis Marie Reid," a/k/a "Melissa Webster," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and object of the conspiracy that ISIS MARIE CAPRE FRANCESHI, a/k/a "Marie Capre," a/k/a "Camilla Febus," a/k/a "Isis Marie Reid," a/k/a "Melissa Webster," the defendant, and others known and unknown, willfully and knowingly, having

devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Wire Fraud)

The United States Attorney further charges:

3. From in or about March 2017 up to and including in or about September 2018, in the Southern District of New York and elsewhere, ISIS MARIE CAPRE FRANCESHI, a/k/a "Marie Capre," a/k/a "Camilla Febus," a/k/a "Isis Marie Reid," a/k/a "Melissa Webster," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, the defendant provided,

and caused to be provided, credit card transaction information, via interstate and international wire communications, in furtherance of a scheme to defraud involving airline and private charter flights.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT THREE
(Aggravated Identity Theft)

The United States Attorney further charges:

4. On or about April 2, 2018, in the Southern District of New York and elsewhere, ISIS MARIE CAPRE FRANCESHI, a/k/a "Marie Capre," a/k/a "Camilla Febus," a/k/a "Isis Marie Reid," a/k/a "Melissa Webster," the defendant, knowingly did transfer and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, the defendant transferred and used the name and credit card number of a particular victim in connection with the defendant's involvement in a conspiracy to commit wire fraud, as charged in Count One of this Information.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

FORFEITURE ALLEGATION

5. As a result of committing the offenses alleged in Counts One and Two of this Information, ISIS MARIE CAPRE FRANCESHI, a/k/a "Marie Capre," a/k/a "Camilla Febus," a/k/a "Isis Marie Reid,"

a/k/a "Melissa Webster," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.


SUBSTITUTE ASSET PROVISION

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN **BB**
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ISIS MARIE CAPRE FRANCESHI,
a/k/a "Marie Capre,"
a/k/a "Camilla Febus,"
a/k/a "Isis Marie Reid,"
a/k/a "Melissa Webster,"

Defendant.

INFORMATION

(18 U.S.C. §§ 1349, 1343, and
1028A(a)(1), 1028A(b), and 2.)

GEOFFREY S. BERMAN
United States Attorney
